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FOUNDED 1866

January 22, 2016

By ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Lykourgos Tsirakis v. Field Street Capital Management, LLC*, No. 1:16-cv-00024

Dear Judge Castel:

This firm represents Defendant Field Street Capital Management, LLC. We write on behalf of both parties to seek the Court's approval of the schedule the parties have agreed upon regarding answering the interrogatory served January 7, 2016 pursuant to the Court's Order dated January 6, 2015 (Dkt. No. 5), the filing of Plaintiff's amended complaint and Defendant's response thereto. The proposed schedule is consistent with the Court's prior orders and will remove any ambiguity regarding such deadlines. We respectfully request that the Court order the following:

1. Defendant will respond to Plaintiff's jurisdictional interrogatory by Jan. 25, 2016. (This date is prior to the time otherwise applicable under Rule 33.)
2. As previously directed by the Court, Plaintiff will amend his complaint by February 8, 2016. Service of the amended complaint may be made via ECF filing.
3. Defendant will not be required to respond to the current complaint, but will answer, move against, or otherwise respond to the amended complaint within 14 days of service of the same. (This date follows the time provided for in Rule 15(a)(3).)
4. No other deadlines are affected by this stipulation.

Plaintiff's counsel consents to this submission. No prior request for this relief has been submitted. An initial pre-trial conference has been scheduled for March 1, 2016. We appreciate the Court's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric G. Hoffman", with a long horizontal flourish extending to the right.

Eric G. Hoffman

cc: Mark Hyland, Esq. (via ECF)